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March 30, 2015

**VIA ECF**

Hon. Colleen McMahon  
U.S. District Court for the Southern District of New York  
500 Pearl Street, Room 1640  
New York, NY 10007

**Re: Moore, et al. v. Navillus Tile, Inc., et al., 14-CIV-8326 (CM)(JLC)**

Dear Judge McMahon,

I write as counsel to Defendants Navillus Tile, Inc., Donal O'Sullivan, and Helen O'Sullivan in the above-referenced case. Discovery on the alter ego issue concluded on March 23, 2015. No formal scheduling order has been entered in this case.

All parties request a briefing schedule for Defendants' anticipated Motions for Summary Judgment as follows:

- Defendants' Motions for Summary Judgment are due on Monday May 11, 2015.
- Plaintiffs' Opposition is due on Monday June 1, 2015.
- Defendants' Replies are due on Thursday June 11, 2015.

All parties also request that Defendants' Motions for Summary Judgment and Plaintiffs' Opposition be limited to 35 pages and Defendants' Replies be limited to 15 pages.

Thank you for your consideration to these requests.

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Very truly yours,

/s/ Willis J. Goldsmith

Willis J. Goldsmith

**So Ordered:** \_\_\_\_\_